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11 Attorneys for Defendant
GOOGLE INC.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,

16 Plaintiffs,

17 v.

18 GOOGLE INC.,

19 Defendant.

Case No. 3:10-cv-03561 WHA

**GOOGLE INC.'S ADMINISTRATIVE
MOTION TO SEAL GOOGLE'S
PROFFER RE: GNU CLASSPATH**

Dept. Courtroom 8, 19th Fl.
Judge: Hon. William Alsup

1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Google Inc. (“Google”) hereby
2 moves to file under seal Google’s Proffer re: GNU Classpath. Google seeks to file under seal the
3 portions of the proffer that summarize, quote from, or reproduce portions of materials that have
4 been designated by Oracle as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL –
5 ATTORNEY’S EYES ONLY” under the Protective Order. The portions of this response that
6 summarize, quote from, or reproduce portions of materials designated by Oracle as
7 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” are set
8 forth in the Declaration of Kate Lazarus in Support of Google’s Motion to Seal. Google states no
9 position on whether disclosure of the information designated by Oracle would result in
10 competitive harm to Oracle.

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12 Dated: April 30, 2016

KEKER & VAN NEST LLP

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